

CAUSE NO. 22-00105

CSD VAN ZANDT LLC  
*Plaintiff*

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IN THE DISTRICT COURT

v.

294<sup>TH</sup> JUDICIAL DISTRICT

UDO BIRNBAUM  
*Defendant*

VAN ZANDT COUNTY, TEXAS

**PLAINTIFF’S RESPONSE TO FIRST REQUEST FOR PRODUCTION  
TO CSD VAN ZANDT LLC**

TO: Udo Birnbaum, Pro Se, located at 540 VZ County Road 2916, Eustace, Texas 75124.

COMES NOW, Plaintiff, CSD VAN ZANDT LLC, (hereinafter “Plaintiff”) and files its *Response to First Request for Production to CSD Van Zandt LLC* pursuant to the Texas Rules of Civil Procedure.

Respectfully submitted,

**FLOWERS DAVIS, P.L.L.C.**  
1021 ESE Loop 323, Suite 200  
Tyler, Texas 75701  
(903)534-8063 Phone  
(903)534-1650 Fax

/s/ Katryna R. Watkins  
**KATRYNA R. WATKINS**  
State Bar No. 24106554  
[krw@flowersdavis.com](mailto:krw@flowersdavis.com)

**ATTORNEY FOR PLAINTIFF**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of this instrument was served on all parties of record via electronic service manager on the 30<sup>th</sup> day of December 2022.

/s/ Katryna R. Watkins  
**KATRYNA R. WATKINS**

## **RESPONSE TO FIRST REQUEST FOR PRODUCTION**

**PRODUCTION NO. 1:** Such documents as CSD Van Zandt LLC in paragraph 15 of Plaintiffs First Amended Original Petition claims show Plaintiff obtaining title to the 148.12 acre Premises "via a regular chain of conveyance from the sovereign", and specifically documents showing passage of conveyance of title through the 2021 belated probate by LISA L. GIROT of intestate GWENDOLYN WRIGHT THIBODEAUX estate of 2006, and further through the 2019 estate of LOUIS THIBODEAUX unto LISA L. GIROT.

*(i.e. "15. Plaintiff obtained title to the Property via a regular chain of conveyance from the sovereign, as explained hereinabove.")*

**RESPONSE:** Plaintiff objects to the foregoing request as lacking specificity as Defendant does not identify the probate causes involving Gwendolyn Thibodeaux and Louis Thibodeaux to which he refers. *See Davis v. Pate*, 915 S.W.2d 76, 79 n.2 (Tex. App.---Corpus Christi 1996, orig. proceeding). Subject thereto, all documents responsive to this request have been produced.

**PRODUCTION NO. 2:** Such deed, if any, conveying title to LISA GIROT, to have title to convey.

**RESPONSE:** Plaintiff objects to the foregoing request as vague and unclear as Plaintiff cannot determine to which property or properties the above-mentioned deed or title refer. *See Davis v. Pate*, 915 S.W.2d 76, 79 n.2 (Tex. App.---Corpus Christi 1996, orig. proceeding). Subject thereto, all documents responsive to this request have been produced.

**PRODUCTION NO. 3:** Such deed, if any, conveying title to PATRICIA MOORE BARCLAY, to have title to convey.

**RESPONSE:** Plaintiff objects to the foregoing request as vague and unclear as Plaintiff cannot determine to which property or properties the above-mentioned deed or title refer. *See Davis v. Pate*, 915 S.W.2d 76, 79 n.2 (Tex. App.---Corpus Christi 1996, orig. proceeding). Subject thereto, all documents responsive to this request have been produced.

**PRODUCTION NO. 4:** Such deed, if any, conveying title to JAMES T. MOORE III, to have title to convey.

**RESPONSE:** Plaintiff objects to the foregoing request as vague and unclear as Plaintiff cannot determine to which property or properties the above-mentioned deed or title refer. *See Davis v. Pate*, 915 S.W.2d 76, 79 n.2 (Tex. App.---Corpus Christi 1996, orig. proceeding). Subject thereto, all documents responsive to this request have been produced.